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May 4, 2011

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Reporting Requirements for U.S. Providers of International  
Telecommunications Services, IB Docket No. 04-112**

**Joint Petition for Rulemaking to Further Reform the International  
Settlement Policy, RM-11322**

Dear Ms. Dortch:

On May 3, 2011, Katharine Saunders, Leora Hochstein, and I met with Angela Giancarlo, Chief of Staff & Senior Legal Advisor to Commissioner McDowell, and spoke via telephone to Charles Mathias, Legal Advisor to Commissioner Baker. On May 4, 2011, we and James Talbot and Amy Alvarez of AT&T met with Zachary Katz, Legal Advisor to Chairman Julius Genachowski, and with Mindel De La Torre, Troy Tanner, James Ball, David Krech, David Strickland, and Mark Uretsky of the Commission's International Bureau. We also met with Louis Peraertz, Legal Advisor to Commissioner Clyburn; and with Margaret McCarthy, Policy Advisor, and Joshua Cinelli, Media Advisor, to Commissioner Copps, in connection with the above-referenced proceedings, and had a follow-up call with Ms. Giancarlo.

In these meetings we discussed our view that eliminating the reporting requirements of Sections 43.61 and 43.82 of the Commission's rules would be in the public interest, consistent with the President's recent encouragement to eliminate regulations that are unnecessary or no longer make sense.<sup>1</sup> These reports and requirements have little use as industry markers given the substantial growth in competition on international routes and competitive alternatives to placing traditional international calls. In addition, these current traffic and circuit reporting requirements are burdensome, requiring collection of data and then substantial manual manipulation into the form requested by the Commission – a form often inconsistent with Verizon's internal needs and data collection systems. We further explained that, to the extent future changes would

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<sup>1</sup> See Improving Regulation and Regulatory Review – Executive Order, § 3.7, <http://www.whitehouse.gov/the-press-office/2011/01/18/improving-regulation-and-regulatory-review-executive-order> (Jan. 18, 2011).

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require the collection or submission of new or different information or categories of data, those changes could impose additional burdens or require redesigning processes that would not only eliminate any reduction in burden otherwise achieved, but could well cause an increase in overall cost and obligation. We also discussed the importance of preserving confidentiality for any remaining reporting requirements that obligated production of competitively sensitive information such as traffic and revenue data.

We further expressed support for prompt action by the Commission to remove the International Settlements Policy restrictions that still apply to the small percentage of international routes remaining, thus extending to all routes the reforms and commercial flexibility adopted in 2004. We noted that while the Commission may have concerns about how to address remaining instances of anticompetitive conduct by foreign carriers, many of these issues may be best resolved government to government, rather than by imposing restrictions on U.S. based carriers that could negatively impact U.S. consumers.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

/s/ Jacquelynn Ruff

Jacquelynn Ruff

cc: Angela Giancarlo  
Charles Mathias  
Zachary Katz  
Mindel De La Torre  
Troy Tanner  
James Ball  
David Krech  
David Strickland  
Mark Uretsky  
Louis Peraertz  
Margaret McCarthy  
Joshua Cinelli